Chapter 4

Agricultural Resources

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Chapter 4
Agricultural Resources

This chapter analyzes the proposed action's potential effects related to agricultural resources. Related discussions are found in Chapter 3 (*Land Use and Planning*) (impacts of proposed action on land use planning generally); Chapter 16 (*Socioeconomics*) (socioeconomic outcomes of converting very small acreages of agricultural land to nonagricultural uses); and Chapter 18 (*Cumulative Effects*) (analysis of agricultural conversions under the proposed action in the broader context of all agricultural conversions throughout the action area, over the entire permit term).

Key sources of data used in the preparation of this chapter include the following.

- The proposed HCP (Appendix B of this EIS/EIR).
- American Farmland Trust website.
- California Department of Conservation website.

Specific reference information is provided in the text.

Affected Environment

Regulatory Framework

The following sections provide a brief description of the major federal and state programs that regulate agricultural resources in the action area as well as a description of how agricultural resources are integrated into land use planning by local agencies. As identified elsewhere in this document, PG&E's land use planning is under the sole jurisdiction of the California Public Utilities Commission (CPUC), but PG&E consults with local jurisdictions and other agencies to ensure that their concerns are considered to the extent feasible in project planning, construction, and operation.

Federal Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) of 1984 requires federal agencies to consider how their activities or responsibilities may affect farmland, in particular

financing or assisting construction of improvement projects and acquiring, managing, or disposing of federal land and facilities. To comply with the provisions of the FPPA, the federal agency responsible for NEPA compliance must consult with the Department of Agriculture's Natural Resources Conservation Service (NRCS) and complete a Land Evaluation and Site Assessment (LESA) for each affected site or area. The federal lead agency is also responsible for coordinating completion of the Farmland Conversion Impact Rating Form (Form AD-1006) with the NRCS as part of the LESA process.

LESA is a point-based approach that rates the relative importance of agricultural land resources based on specific measurable factors (California Department of Conservation 2004). Under the LESA system, proposed project sites receive scores based on several criteria, including soil quality and existing land use. The resulting score is an indicator of the quantitative impact that the proposed action or program may have on important farmland. The lead federal agency may consider this information when deciding on implementation or modification of certain actions or programs.

State Programs and Regulations

Farmland Mapping and Monitoring Program

The California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP), administered by the Division of Land Resource Conservation, is responsible for mapping and monitoring Important Farmlands for most of the state's agricultural areas. The FMMP updates its farmland maps every 2 years based on information from local agencies. FMMP maps show five categories of agricultural lands and three categories of nonagricultural lands, described in the following sections.

Agricultural Lands

Following are descriptions of the farmland mapping categories used by the state's FMMP. The minimum mapping unit for all agricultural land categories except Grazing Land is 10 acres. The minimum mapping unit for Grazing Land is 40 acres.

Note that Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are the most suitable for agriculture and are considered especially important agricultural resources. They are often referred to collectively as *important farmland*. Grazing Land may also qualify as important farmland where grazing is a key component of the local economy. Consistent with this trend, this EIS/EIR includes Grazing Land as important farmland because of the importance of grazing to the action area's economy.

- *Prime Farmland* is defined by the state as "irrigated land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops." Prime Farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. To be designated as Prime Farmland, the land must have been used

for production of irrigated crops at some time during the 4 years prior to the mapping date.

- *Farmland of Statewide Importance* is defined by the state as "irrigated land similar to Prime Farmland that has a good combination of physical and chemical characteristics for the production of agricultural crops." However, this land has minor shortcomings, such as steeper slopes or less ability to store soil moisture than Prime Farmland. In order for land to be designated as Farmland of Statewide Importance, it must have been used for production of irrigated crops at some time during the 4 years prior to the mapping date.
- *Unique Farmland* is considered to consist of lower-quality soils but nonetheless is used for production of the state's leading agricultural crops. Unique Farmland is usually irrigated, but may include nonirrigated orchards or vineyards in some climatic zones in California. To qualify for this designation, land must have been used for crops at some time during the 4 years prior to the mapping date.
- *Farmland of Local Importance* is land identified as important to the local agricultural economy by each county's board of supervisors and a local advisory committee.
- *Grazing Land* is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

Nonagricultural Lands

Following are descriptions of the nonagricultural land mapping categories used by the FMMP. Mapping units for nonagricultural lands vary, as described below.

- *Urban and Built-Up Lands* consist of land occupied by structures with a building density of at least 1 structure to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This type of land is used for residential, industrial, commercial, construction, institutional, and public administration purposes; railroad and other transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment facilities; water control structures; and other developed purposes.
- *Other Land* is land not included in any other mapping category. Examples include low-density rural developments and brush, timber, wetland, and riparian areas not suitable for livestock grazing. This category also includes vacant and nonagricultural land surrounded on all sides by urban development; confined livestock, poultry, or aquaculture facilities; strip mines; borrow pits; and water bodies smaller than 40 acres.
- *Water* includes perennial water bodies with an extent of at least 40 acres.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act (Williamson Act) is one of the state's primary mechanisms for conserving farmland. The Williamson Act enables

counties and cities to designate agricultural preserves (Williamson Act lands) and to offer preferential taxation to private agricultural landowners based on the income-producing value of their property in agricultural use, rather than on the property's assessed market value. In return for the preferential tax rate, the landowner is required to sign a contract with the county or city agreeing not to develop the land for a minimum 10-year period. Contracts are automatically renewed annually unless a party to the contract files for nonrenewal or petitions for cancellation. If the landowner chooses not to renew the contract, it expires at the end of its duration. Under certain circumstances, a county or city may approve a request for cancellation of a Williamson Act contract. Cancellation requires private landowners to pay back taxes and cancellation fees.

Land uses allowed on parcels under Williamson Act contracts are regulated by Government Code Section 51238. Government Code Section 51238(a)(1) states that

> Notwithstanding any determination of compatible uses by the county or city pursuant to this article, unless the board or council after notice and hearing makes a finding to the contrary, the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve.

Thus, gas and electric facilities are "compatible" (i.e., allowable) uses in agricultural preserves as long as the facilities will not do either of the following.

> [S]ignificantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves …
>
> [S]ignificantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves …

Each city and county has the discretion to determine which land uses are compatible with Williamson Act contracts within their jurisdiction, provided these uses are not prohibited under the Act.

Local Regulations

General Plan Process and Agricultural Lands

All cities and counties within California are required to adopt a general plan establishing goals and policies for long-term development, protection from environmental hazards, and conservation of identified natural resources (California Government Code 65300). Local general plans lay out the pattern of

future residential, commercial, industrial, agricultural, open space, and recreational land uses within a community[1].

The general distribution and location and the extent of allowable uses for agricultural lands within a given city or county is typically designated by the land use element in the general plan. In California, the trend is for local planning documents to include goals and policies aimed at balancing the preservation of existing agricultural land with the increasing demands for housing and other types of urbanization. Of particular relevance to the analyses in this chapter, irrigated and/or agricultural activities are typically considered permitted uses under agriculture land use designations. Grazing activities may be permitted uses under multiple land use designations, including but not necessarily limited to agricultural, grassland, and open space.

To facilitate implementation of planned growth patterns, general plans also typically include goals and/or policies addressing the coordination of land use patterns with the development and maintenance of infrastructure facilities and utilities. In most land use designation types, local planning documents and zoning ordinances provide for the installation and operation and maintenance (O&M) of utilities necessary to facilitate and support planned growth patterns.

Exemption From Local Planning Regulations

Article VII, Paragraph 5 of the California Constitution, through the state legislature, vests the CPUC with exclusive jurisdiction over the siting and design of gas and electrical facilities. California Public Utilities Code Section 1007.5 and other California statutes and case law detail the nature and extent of this sole discretionary permitting authority. Because state law has preempted the field, PG&E is not subject to local land use planning or zoning requirements. Nonetheless, as described above and in Chapter 3 (*Land Use*), PG&E consults with local agencies on land use issues when locating its facilities.

Existing Conditions

The action area includes part or all of nine counties—San Joaquin, Stanislaus, Merced, Fresno, Kings, Kern, Mariposa, Madera, and Tulare—in the San Joaquin Valley, the heart of California's top agricultural producing region (Figure 1-1). While the proportion of different land uses varies by county, agricultural and grazing land is by far the dominant land use in the action area. Table 4-1 shows land use acreages for each county in the action area, for comparison with the acreages of Important Farmland presented in Table 4-2.

[1] For more information about general plans and local land use planning, see Chapter 3 (*Land Use and Planning*).

Table 4-2. Important Farmland Acreage in Action Area Counties, 2000

	Irrigated Farmland			Nonirrigated Farmland	
County	**Prime**	**Statewide**	**Unique**	**Local**	**Grazing Land**
Fresno	363,758	139,546	93,751	45,112	319,691
Kern (NW, SE)	531,205	109,622	51,076	0	903,243
Kings	142,665	433,245	24,740	6,851	238,301
Madera	102,053	85,086	163,543	24,041	401,568
Mariposa	29	98	145	0	408,308
Merced	286,924	158,536	98,965	46,088	581,501
San Joaquin	423,158	93,846	57,977	56,009	150,332
Stanislaus	266,340	29,100	56,269	34,851	375,147
Tulare	393,036	351,689	11,749	117,741	439,933

Note: Only 57% of the total project area has been mapped by California Department of Conservation's Farmland Mapping and Monitoring Program.

Source: American Farmland Trust 2004.

Fertile soils, a long growing season, and the reliable availability of irrigation water in the San Joaquin Valley provide a favorable combination of conditions that support a wide variety of crops. Orchards that produce a wide range of fruit and nuts and irrigated vineyards occupy a large portion of the area. Numerous ranches and dairy facilities are also located in the valley, especially along its western edge. In total, nearly 300 different agriculture-based commodities are produced in this area.

Agriculture in the San Joaquin Valley is a major contributor to the region's economy. Farm and agricultural services are one of the top employers in the Northern San Joaquin Valley, second only to government jobs. Including food processing, agriculture employs over 30% of the area's workforce (American Farmland Trust 2004).

Agricultural Land Conversion

California is the nation's most populous state (more than 34 million people) and the fastest growing. As California's population increases, agricultural land is being converted to urban land uses, including commercial, industrial, and residential, at a rapid rate (American Farmland Trust 2004). Agricultural land is also being converted for recreational uses such as parks and golf courses. According to the FMMP, net loss of irrigated agricultural land in the state was 42,039 acres between 1998 and 2000, and net loss in the counties in the action area was 21,344 acres (Table 4-3) (California Department of Conservation 2002).

Table 4-1. Land Use in Action Area by County (Percentage of Total County Acreage)

	County								
Land Use	**Fresno**	**Kern**	**Kings**	**Madera**	**Mariposa**	**Merced**	**San Joaquin**	**Stanislaus**	**Tulare**
Agricultural and Grazing	86	74	92	79	52	94	77	89	84
High-Density Commercial	0	0	0	0	0	0	1	1	0
High-Density Residential	1	0	1	0	0	0	1	0	1
Industrial	1	1	1	1	0	1	3	1	0
Low-Density Commercial	0	1	1	0	0	1	2	0	0
Low-Density Residential	3	1	1	8	14	0	4	0	0
Medium-Density Residential	3	2	1	4	0	3	7	5	2
Mixed Use	0	0	0	0	0	0	0	0	3
Planned Development	0	0	0	0	0	0	0	0	0
Public Lands and Open Space	5	19	1	6	21	1	3	0	7
Undetermined	0	0	0	0	13	0	0	0	0
Urban Reserve	1	1	1	1	0	1	2	2	1
Water	0	0	0	0	0	0	0	0	0
Grand Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

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Table 4-3. Net Change in Irrigated Land 1998–2000

County	Net Change in Irrigated Land (Acres)	Rank[a,b]
Kern (NW, SE)	–11,501	2
Tulare	–8,664	5
Fresno	–6,399	6
San Joaquin	–3,711	11
Merced	–1,281	18
Mariposa	14	29
Madera	2,271	38
Stanislaus[c]	3,472	39
Kings	4,455	42
Total for Action Area Counties	**–21,344**	
Total for All Counties in California	–42,039	

Note: Net change includes the impact of urbanization, conversion to Other Land, removal from irrigated use due to idling, as well as conversions into irrigated use. The net figure also includes any soil unit reclassifications or other revisions within irrigated categories.

[a] Figures for *Important* and *Interim* sections of Kern County have been grouped for county ranking.

[b] Rank out of 46 counties; lower rank indicates greater conversion of agricultural lands.

[c] Conversion figures for Stanislaus County do not include the area west of the San Joaquin River, which was added to the survey area in 2000.

Source: American Farmland Trust 2004.

Environmental Consequences and Mitigation Strategies

Methodology for Impact Analysis

The impact analysis in this chapter focused on evaluating the potential of the proposed action and alternatives to result in the conversion of farmland to nonagricultural uses and to generate conflict with existing Williamson Act contracts in the action area. Impacts were evaluated qualitatively, based on professional judgment in light of the activities, methods, and techniques entailed by PG&E's San Joaquin Valley O&M program, and the additional AMMs that would be enacted under the proposed HCP (see Chapter 2, *Proposed Action and Alternatives*). Socioeconomic effects of agricultural conversion are addressed separately in Chapter 16 (*Socioeconomics*).

Information on impacts related to land use planning in general is presented in Chapter 3. Issues related to the conversion of agricultural lands as an indirect result of changing patterns of land use in the action area are discussed in Chapter 19 (*Growth Inducement and Related Effects*).

Significance Criteria

For the purposes of this analysis, an impact was considered to be significant and to require mitigation if it would result in either of the following.

- Conversion of a substantial amount of important farmland (Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Grazing Land, as shown on the maps prepared pursuant to the State of California's FMMP) to nonagricultural use.
- Substantial conflict(s) with existing Williamson Act contracts.

Impacts and Mitigation Measures

Proposed Action

Impact AG1—Potential for the conversion of important farmland to nonagricultural uses due to O&M and minor construction activities. O&M and minor construction activities have varying potential to affect agricultural lands.

O&M tasks such as vegetation management and maintenance and patrol activities would be temporary and short-term and would be restricted to existing PG&E rights-of-way (ROWs) and immediately adjacent areas, and thus would not result in the permanent conversion of farmland to nonagricultural uses. Most other activities associated with O&M of existing facilities and infrastructure would also occur within existing PG&E–owned properties or ROWs and adjacent areas; therefore, no conversion of farmland would occur as a result of these activities either. In addition, company policy requires that any affected lands not owned by PG&E be restored to landowner specifications following completion of O&M tasks.

The principal potential for permanent conversion of farmland to nonagricultural uses relates to facilities upgrades and expansions, and construction of new facilities. Some new or expanded facilities such as pipelines and underground transmission and distribution lines would be underground once construction is complete and would not result in the permanent conversion of farmland. Aboveground upgrades and expansions, and new aboveground facilities, could require footprints ranging from several hundred square feet to an average of about 5 acres. Any such upgrades and expansions that take place on land designated as agricultural would result in conversion of small increments of farmland to nonagricultural use. Based on PG&E's projections, the total

permanent loss of agricultural lands under the proposed action is expected to be a maximum of 2 acres per year over the 30-year permit term, and the total permanent loss of grassland (including grassland that supports grazing use) is estimated at a maximum of 1 acre per year; thus, even making the worst-case assumption that all affected agricultural lands would qualify as important farmland, the maximum amount of important farmland that might be converted to nonagricultural uses due to installation of new facilities, expansion of existing facilities, and acquisition of new ROWs would be very small.

Moreover, as described in Chapter 2 (see *Land Use Planning Practices* in *PG&E's Existing Environmental Programs and Practices*), PG&E will carry forward all of its standard business practices (reflecting the company's obligations under CPUC regulations) in implementing the activities enabled under the proposed action. In siting new facilities, the company routinely consults with local jurisdictions to avoid or minimize conflicts with existing and planned land uses, and may modify the proposed siting or design of new facilities based on such consultation.

In light of the small acreages involved and the business practices PG&E brings forward under the proposed action, **impacts related to conversion of important farmland to nonagricultural uses supporting new or expanded facilities are expected to be less than significant.**

Mitigation Measure—No mitigation is required

Impact AG2—Potential for the conversion of important farmland due to implementation of compensation options. Farmlands that support the production of irrigated crops are unlikely to be identified as conservation lands because of their highly disturbed condition. Thus, in view of the extent of active cultivation in the action area, three of the four FMMP mapping categories in the action area are unlikely to be affected by habitat compensation: Prime Farmland, Unique Farmland, and Farmland of Statewide Importance.

However, the FMMP's Grazing Land category includes unirrigated grasslands in the action area, and some if not all of the action area's grassland likely qualifies as important farmland in view of the importance of grazing to the area's economy (see discussion in *Agricultural Lands* section of *Farmland Mapping and Monitoring Program* under *State Programs and Regulations* above). The proposed HCP identifies high-quality grasslands as the most desirable type of land to be acquired as compensation for habitat disturbance resulting from O&M and minor construction activities. Thus, the *Purchase of Conservation Lands* compensation option[2] has the potential to result in conversion of important farmlands to nonagricultural uses. In accordance with the proposed HCP's Conservation Strategy (see Appendix B of this EIS/EIR), grazing could continue as a management tool on many acquired preserve lands that were previously grazing lands, although grazing practices might be modified and brought into compliance with the proposed HCP's Conservation Strategy and management

[2] For complete descriptions of the proposed HCP's compensation options, see *Compensation* under *Environmental Commitments Enacted by the Proposed HCP* in Chapter 2.

framework; modifications could include shifting grazing regimes from year-round to seasonal, or changing grazing intensity, duration, or location. Grazing might also be reduced on some preserve lands in order to meet the biological needs of the wildlife in the area, to avoid overgrazing, or to prevent trampling of protected plants.

In addition, under the *Enhancement as Compensation* option, existing ROWs located on important farmland could be identified as suitable sites for enhancement. The process for identifying suitable and appropriate conservation lands would likely eliminate many potential enhancement sites on grazing lands as excessively disturbed and thus inappropriate for compensation use. However, there may be situations in which options for habitat enhancement sites are limited, and the only feasible option is to use a ROW located on grazing lands. If ROW land located on important farmland were identified as an enhancement site, PG&E's existing policies and practices would require coordination with a willing landowner to minimize potential effects on existing grazing activities.

In summary, both the *Purchase of Conservation Lands* option, which would establish new preserves, and the *Enhancement as Compensation* option, which would use existing ROW easement lands, could result in the limited conversion of important farmland to nonagricultural uses.

However, lands would only be acquired from willing sellers, and most lands identified for acquisition and/or enhancement would likely continue to be grazed after acquisition, and thus would not undergo a change in uses. In the unlikely worst-case scenario where grazing was discontinued on compensation lands, the total area of land affected would be very small. Moreover, in contrast to a residential development or other similar project, the proposed action would not result in the loss or conversion of agricultural land to urban or other developed use; under the proposed action, any grasslands acquired for mitigation use would be permanently protected from urban development and managed to benefit biological resources in perpetuity. Because of the commitment to manage mitigation lands for biological benefit, the physical attributes of unirrigated grassland that may be acquired under the proposed action would not be lost or otherwise altered. Consequently, no significant *physical* impact on agricultural land is expected.

In addition, as identified in Chapter 2 and in Impact AG1 above, PG&E will carry forward all of its standard business practices (reflecting the company's obligations under CPUC regulations) in implementing the activities enabled under the proposed action. The company's practice of consulting with local jurisdictions to avoid or minimize conflicts with existing and planned land uses when new facilities are sited would also apply to locating conservation lands, providing a mechanism to address potential changes in use that might be viewed as undesirable by local planning authorities.

In light of these factors, these options' potential impacts related to conversion of agricultural lands are not expected to be significant.

None of the other compensation options identified in the proposed HCP would directly facilitate conversion of important farmland within the action area. Contributions to existing mitigation banks or donations to conservation organizations would support existing or separately planned uses and would therefore not result in any new adverse or beneficial effects on agricultural resources. **These options would have no impact on agricultural resources.**

Mitigation Measure—No mitigation is required.

Impact AG3—Potential to conflict with existing Williamson Act contracts. Although gas and electric facilities are considered a compatible use in agricultural preserves under Section 51238 of the California Government Code, construction of minor new facilities could require cancellation of Williamson Act contracts for small acreages, if new land acquisition is required. In addition, although it is unlikely, it is possible that compensation lands could be identified on lands under Williamson Act contract, such that either the *Purchase of Conservation Lands* option or the *Enhancement as Compensation* option could result in withdrawal of lands from Williamson Act protection. This would also constitute a conflict with Williamson Act contracts. However, the total area likely to be affected under either of these scenarios would be very small. Furthermore, cancellations are unlikely because of the tax benefits to PG&E of maintaining these properties under the Williamson Act; therefore, no substantial conflict is anticipated. **This impact is thus expected to be less than significant.**

Mitigation Measure—No mitigation is required

Alternative 1—HCP with Reduced Take

Alternative 1 would enable the same program of O&M and minor construction activities as that described for the proposed action, with minor differences in the commitments for protection of biological resources. Alternative 1 would enact the same environmental commitments for other resource areas identified in this EIS/EIR for the proposed action, and compensation ratios for loss or disturbance of habitat would also be the same.

The key difference between the proposed action and Alternative 1 is that Alternative 1 would implement avoidance and minimization measures (AMMs) at a lower level of effect than the proposed action, with the intent of reducing take. Although the level of take would be reduced because of the increased stringency associated with implementation of the AMMs, compensation needs are expected to be similar under both alternatives, because compensation acreages would be based on acreage affected rather than level of take. Consequently, under Alternative 1, impacts on agricultural resources would be similar to those described for the proposed action.

Alternative 2—HCP with Enhanced Compensation

Alternative 2 would enable the same program of O&M and minor construction activities and the same environmental commitments for other resource areas identified in this EIS/EIR for the proposed action. Differences between Alternative 2 and the proposed action center on compensation ratios for habitat disturbed or lost (greater under Alternative 2 than under the proposed action). Under Alternative 2, assuming the same level of habitat disturbance, overall compensation requirements would be higher than under the proposed action, although criteria for identifying suitable compensation lands would remain the same and selection of appropriate compensation lands would be subject to the same agency approval.

As the demand for compensation lands increases, availability of lands that support the appropriate habitat types can be expected to decrease, both within and outside of PG&E ROWs. However, where appropriate and available compensation lands cannot be identified for purchase or easement, other compensation options would be still available (i.e., purchase of mitigation credits, donations, and enhancement), and might be more extensively used; reliance on compensation options other than acquisition by purchase or easement might offset some of the difference in compensation needs. Nonetheless, the enhanced compensation requirements under Alternative 2 would result in greater overall compensation requirements and, as a result, could lead to the establishment of a greater number and/or larger acreage of preserves. Consequently, impacts on agricultural resources would likely be slightly greater under Alternative 2 than those described for the proposed action, when viewed from a NEPA perspective. Impacts under CEQA would be the same; that is, less than significant. This is because the physical attributes of agricultural/grazing lands that may be acquired for habitat compensation use under the proposed action would not be lost or otherwise altered by the proposed action, although they would be managed to benefit biological resources as opposed to focused solely on the production of agricultural commodities. In this sense, acquisition and management of agricultural/grazing lands to benefit biological resources is not expected to result in a significant impact on the environment associated with the loss of agricultural land.

Alternative 3—HCP with Reduced Number of Covered Species

Alternative 3 would enable the same program of O&M and minor construction activities as that described for the proposed action, and would enact the same additional environmental commitments for other resource areas identified in this EIS/EIR. The key difference between Alternative 3 and the proposed action relates to the number of species covered under Alternative 3 (reduced by comparison with the proposed action, as described in Chapter 2). Depending on their status at the time, other species might be subject to state, and possibly also federal, requirements for impact assessment and compensation, which would need to be addressed on a case-by-case basis.

Under Alternative 3, reducing the number of covered species could result in the establishment of a smaller number of preserves or preserves that encompass smaller geographic areas by comparison with the proposed action. At the same time, additional, case-by-case assessment of compensation needs might be required for any individual activities identified as having the potential to affect noncovered special-status species. It is difficult to determine the precise effect that this approach would have on agricultural lands since detailed compensation needs cannot be identified at this time. However, because Alternative 3 could require the assessment of at least some compensation needs on a case-by-case basis, it could result in the identification of smaller parcels of land (including ROW areas) for enhancement use, compared to the proposed action. Also, while Alternative 3 could result in smaller contiguous areas for acquisition and/or enhancement use, more numerous acquisitions could also occur under Alternative 3. Depending on availability of appropriate habitat, multiple land acquisitions and/or enhancement areas could potentially be scattered throughout the action area.

As the demand for compensation lands increases, availability of lands that support the appropriate habitat types can be expected to decrease, including areas within PG&E ROWs. Where appropriate and available compensation lands cannot be identified for purchase or easement, other compensation options would still be available (e.g., purchase of mitigation credits, donations, and enhancement); reliance on compensation options other than acquisition by purchase or easement could offset some of the difference in compensation needs. However, criteria for identifying suitable compensation lands would remain the same, and selection of appropriate compensation lands would be subject to USFWS and DFG approval. Alternative 3 would thus have some potential to permanently affect agricultural lands (and particularly grazing lands) in the action area, and impacts could be spread over a wider area because more activity-by-activity compensation could be required. Impacts related to agricultural resources would probably be essentially the same or slightly greater under Alternative 3 compared to those described for the proposed action, when viewed from a NEPA perspective. As described for Alternative 2, impacts under CEQA would be the same; that is, less than significant. This is because the physical attributes of agricultural/grazing lands that may be acquired for habitat compensation use under the proposed action would not be lost or otherwise altered by the proposed action, although they would be managed to benefit biological resources as opposed to focused solely on the production of agricultural commodities. In this sense, acquisition and management of agricultural/grazing lands to benefit biological resources is not expected to result in a significant impact on the environment associated with the loss of agricultural land.

Alternative 4—No Action

Under the No Action Alternative, PG&E would continue its existing program of O&M activities unchanged. No HCP would be implemented, and no other new or additional environmental commitments would be put in place.

Individual actions affecting suitable habitat for listed special-status species would be assessed through case-by-case consultation with USFWS and DFG for level of effect and compensation needs. Because the compensation requirements for habitat disturbance would be assessed on a case-by-case basis, smaller parcels of land would likely be identified for acquisition or enhancement at any given time, but case-by-case assessment could also result in a need for more numerous parcels, potentially distributed over a wider area. This is similar to but more extreme than the case described above for Alternative 3, where most compensation would likely occur under the auspices of an HCP process.

The availability of desirable compensation lands is expected to decrease over time, as lands are used for compensation or other purposes. However, as described for the action alternatives, where appropriate and available compensation lands cannot be identified for purchase or easement, other compensation options would likely still be available (e.g., purchase of mitigation credits, donations, and enhancement).

Because of the need for activity-by-activity consultation, the No Action Alternative would have the potential to result in some permanent loss of agricultural resources in the action area, and the overall nature of effects would be similar to that described above for the proposed action. However, the degree of impact is uncertain. Adverse effects on agricultural resources could be slightly reduced under the No Action Alternative compared to the proposed action since suitable compensation lands might be more difficult to acquire on a case-by-case basis, and smaller parcels might be less likely to meet the biological objectives of compensation; accordingly, payment-type compensation options might be used to a greater degree. It is difficult to assess the precise effect that this approach would have on agriculture because locations and other details about specific habitat enhancement sites are unknown at this time, as are the actual compensation acreages that would be required. Alternatively, if payment-type compensation options were not emphasized, the case-by-case approach to compensation determination under the No Action Alternative would result in a greater number of acquisitions/enhancements, some or all of which could be located on agricultural (largely grazing) lands. Consequently, impacts on agricultural resources could be slightly greater under the No Action Alternative than those described for the proposed action when viewed from a NEPA perspective. As described above for the action alternatives, impacts under CEQA would be the same in this case; that is, less than significant. This is because the physical attributes of agricultural/grazing lands that may be acquired for habitat compensation use under the proposed action would not be lost or otherwise altered by the proposed action, although they would be managed to benefit biological resources as opposed to focused solely on the production of agricultural commodities. In this sense, acquisition and management of agricultural/grazing lands to benefit biological resources is not expected to result in a significant impact on the environment associated with the loss of agricultural land.

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